

1 WHEREAS, Plaintiffs in the above-named action have filed suit against Defendants
2 Autobahn, Inc., Sonic Automotive, Inc. (collectively, “the Autobahn Defendants”), and
3 Mercedes-Benz USA, LLC (“MBUSA”);

4 WHEREAS, Plaintiffs filed their Third Amended Complaint on February 6, 2018;

5 WHEREAS, Defendants’ deadline to respond to the Third Amended Complaint is
6 February 27, 2018;

7 WHEREAS, on November 8, 2017, the parties participated in a mediation session with
8 retired Judge Raul Ramirez of ADR Services, Inc.;

9 WHEREAS, Plaintiffs and the Autobahn Defendants have engaged in further settlement
10 discussions subsequent to the November mediation session;

11 WHEREAS, Plaintiffs and the Autobahn Defendants believe that negotiations have
12 progressed to a point where a further mediation session with Judge Ramirez will be productive;

13 WHEREAS, Plaintiffs and the Autobahn Defendants have agreed upon a framework for
14 further discussions in a second mediation session before Judge Ramirez that would address all
15 claims against the Autobahn Defendants as well as potentially narrow the scope of the claims
16 remaining against MBUSA;

17 WHEREAS, Plaintiffs and the Autobahn Defendants have agreed to schedule a further
18 mediation session with Judge Ramirez in Sacramento on March 9, 2018, which is the first
19 available date on Judge Ramirez’s calendar;

20 WHEREAS, in light of the above, the parties agree and respectfully request that all non-
21 settlement related proceedings, including the deadline for Defendants to respond to the Third
22 Amended Complaint, should be stayed pending the conclusion of the further mediation, to permit
23 the parties to focus their efforts on seeking to resolve and/or narrow the claims in this action.

24 NOW THEREFORE, ALL PARTIES, BY AND THROUGH THEIR UNDERSIGNED
25 COUNSEL hereby stipulate and respectfully request that:

- 26 1. All non-settlement proceedings, including the deadline for Defendants to respond
27 to the Third Amended Complaint, shall be stayed until further Order of the Court.
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1 2. The Case Management Conference set for March 26, 2019 shall be taken off
2 calendar.

3 3. The parties shall submit a status report to the Court on the earlier of: April 9, 2018
4 or five days after agreeing on resolution of some or all of the claims in the case.

5 4. Any party wishing to lift the stay of proceedings may file a request with the Court
6 seeking such relief.

7
8 **IT IS SO STIPULATED.**

9
10 Dated: February 21, 2018 HOGAN LOVELLS US LLP
11 By: ~~/s/ Regina M. Rodriguez~~
12 REGINA M. RODRIGUEZ
13 Attorneys for Defendants
 Mercedes-Benz USA, LLC

14 Dated: February 21, 2018 VARNELL & WARWICK, P.A.
15 By: ~~/s/ David Lietz~~
16 DAVID LIETZ
17 Attorneys for Plaintiffs
18 STEVE FERRARI
 MICHAEL KEYNEJAD, ET AL.

19 Dated: February 21, 2018 WILLIAMS & CONNOLLY LLP
20 By: ~~/s/ F. Greg Bowman~~
21 F. GREG BOWMAN
22 Attorneys for Defendants
 AUTOBAHN, INC. and SONIC AUTOMOTIVE
 INC.

23 ORDER
24 Pursuant to stipulation, this action is stayed through April 30, 2018. The March 26, 2018 case
25 management conference is VACATED. A compliance hearing regarding the status of settlement is
26 set for April 27, 2018, on the Court's 9:01 a.m. calendar. The parties shall file a joint statement
27 regarding the status of their negotiations no later than April 20, 2018.

28 IT IS SO ORDERED.
 Date: February 26, 2018
 
 YVONNE GONZALEZ ROGERS
 United States District Judge